

EXHIBIT A

PATRICE SANCHEZ
MICHAEL J. FITZGERALD vs RONDA MCNAE

July 13, 2023

1

1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA
3 MIAMI DIVISION
4 CASE NO.: 1:22-cv-22171-JEM

5 MICHAEL J. FITZGERALD,
6 individually, and YELANY
7 DE VERONA, individually,

8 Plaintiffs,

9 v.

10 RONDA MCNAE, individually, and
11 WILLIAM MCNAE, individually,

12 Defendants.
13 _____/

14 VIDEOTAPED DEPOSITION OF
15 PATRICE SANCHEZ

16 THURSDAY, JULY 13, 2023
17 10:06 a.m. - 2:27 p.m.

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1 decided that she wanted to make a report against him.

2 Q Okay. And did you ever do that?

3 A No.

4 Q Do you recall Ms. McNae asking you if your
5 sexual relationship with Mr. Fitzgerald was always
6 consensual?

7 MS. CASEY: Objection to the form.

8 THE WITNESS: Yes, she did ask me that.

9 BY MS. GUSSIN:

10 Q And do you believe that your sexual
11 relationship with Mr. Fitzgerald was consensual?

12 A Yes, it was.

13 Q Did you ever give any information or
14 documentation to Ronda McNae to assist her in reporting
15 Mr. Fitzgerald to the police?

16 A I mean, I texted her personal things that I
17 never thought would be used in a courtroom that I
18 thought were always going to be private. Yeah, I told
19 her things.

20 Q But did you ever provide a timeline of any
21 sorts to her?

22 A She asked for specific timelines whether he
23 was in Austin that weekend. I mean, I don't remember
24 exactly what it was, but, I mean, she kind of did the
25 probing. I didn't, like, give her my calendar.

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1 MS. FOTIU-WOJTOWICZ: Objection to the form of
2 the question.

3 MS. CASEY: Same objection.

4 THE WITNESS: I don't -- yeah, I don't think
5 that has any relation whether it was consensual,
6 herpes.

7 BY MS. GUSSIN:

8 Q Have you spoken to Ms. McNae since this
9 lawsuit was filed?

10 A No.

11 Q Are you aware that Ronda McNae and Will McNae
12 have listed you as a witness on their trial witness
13 list?

14 A I don't think I've explicitly been told that.

15 Q Are you aware that they cannot make you
16 testify at the trial of this matter?

17 A Well, I'm aware that I live in a different
18 state, and I wasn't there at any of the incidents that
19 are reported.

20 Q Are you aware that Ms. McNae has alleged to
21 other people that Mr. Fitzgerald raped you?

22 A No, I was not aware of that.

23 Q Are you aware that Ms. McNae's attorney has
24 told numerous witnesses in this case that Mr. Fitzgerald
25 raped you?

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1 MS. FOTIU-WOJTOWICZ: Objection to the form of
2 the question.

3 THE WITNESS: No, and that's really
4 disturbing.

5 BY MS. GUSSIN:

6 Q Are you aware -- sorry, strike that.

7 Ms. Sanchez, do you have any personal
8 knowledge as to what happened between Mike Fitzgerald
9 and Ronda McNae at the penthouse suite in the W Hotel in
10 the early morning hours of October 19, 2019?

11 MS. CASEY: Objection. Asked and answered.

12 THE WITNESS: Yeah, I'm not sure how to answer
13 that.

14 BY MS. GUSSIN:

15 Q Do you have any personal knowledge?

16 A No, no personal knowledge.

17 Q And do you have any personal knowledge as to
18 what happened between Mike Fitzgerald and Ronda McNae in
19 San Francisco during the weekend of November 2nd to 4th,
20 2019?

21 A Like personal -- can you define -- personal
22 knowledge that I've either been told by Ronda or read a
23 police report?

24 Q Personal knowledge based on observation.

25 A No, I don't.

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1 medication from what he told me.

2 BY MS. CASEY:

3 Q Are you aware that Mr. Fitzgerald has admitted
4 in this litigation to seeking therapy from mental health
5 professionals for his problems with lying?

6 MS. GUSSIN: Object to the form of the
7 question.

8 THE WITNESS: I was unaware.

9 BY MS. CASEY:

10 Q Were there ever times that you had sex with
11 Mr. Fitzgerald and he was more aggressive with sex than
12 you were comfortable with?

13 MS. GUSSIN: Object to the form of the
14 question.

15 THE WITNESS: All my sexual relations with him
16 were consensual.

17 BY MS. CASEY:

18 Q My question is a little different. Did you --
19 were there ever times when you had sex with
20 Mr. Fitzgerald and he was more aggressive with sex than
21 you were comfortable with?

22 MS. GUSSIN: Object to the form of the
23 question. Asked and answered.

24 THE WITNESS: No.
25